

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CLAIRE J. LEE,

Plaintiff,

v.

THE CITY OF BLOOMINGTON,
BLOOMINGTON HRA, PREMIER
PROPERTIES, and ANDREW AKINS,

Defendants.

Case No. 0:23-cv-02652-SRN-DJF

JOINT STIPULATION TO MODIFY SCHEDULING ORDER

The Parties, by and through their undersigned counsel, hereby stipulate as follows:

On May 15, 2024, the Court entered the Pretrial Scheduling Order. (ECF No. 50).

The same day that the Court entered the Pretrial Scheduling Order, the Court referred Plaintiff Claire J. Lee to the FBA *Pro Se* Project. (ECF No. 51). Plaintiff's attorneys filed Notices of Appearance on June 24, 2024. (ECF Nos. 54–57). Pursuant to the Court's order, counsel for all parties met and conferred on July 1, 2024 regarding settlement, and filed confidential letters with the Court. (ECF No. 58). On July 10, the Court directed all parties to meet and confer regarding settlement before August 12, 2024, in anticipation of a settlement conference. (ECF No. 60).

On July 15, 2024, Plaintiff's counsel notified Defendants of their intent to propose modifications to the Pretrial Scheduling Order. Defendants agreed to Plaintiff's proposed modifications and proposed additional modifications, which Plaintiff agreed to. On July

17, 2024, Plaintiff's counsel notified the Court that the parties were discussing modifications to the Pretrial Scheduling Order.

The Parties agree that the Scheduling Order should be modified for good cause.

The Pretrial Scheduling Order contains four events with August 1, 2024 deadlines: initial disclosure required by Fed. R. Civ. P. 26(a)(1), exchange of documents identified in each party's Fed. R. Civ. P. 26(a)(1) initial disclosures, motions to join or add parties, and motions to amend the pleadings. Under the current case schedule, these deadlines occur almost two weeks before the August 12, 2024 deadline to exchange settlement demands and offers and meet and confer regarding the demands and offers—and well in advance of the upcoming settlement conference

Plaintiff's attorneys filed Notices of Appearance less than four weeks ago—over halfway through the intervening period between when the Court entered the Pretrial Scheduling Order and the August 1 deadlines. Since June 24, 2024, Plaintiff's attorneys have worked diligently to comply with the Court's orders, participating in a meet and confer with Defendants' counsel regarding a potential settlement conference and filing a confidential letter with the Court regarding the meet and confer. A modification of the scheduling order would provide Plaintiff's counsel with the necessary time to continue consulting with Plaintiff regarding both the upcoming settlement conference as well as her amended pleadings.

Plaintiff and Defendants seek to limit the impact of the proposed modifications to only those four August 1, 2024 deadlines.

Therefore, the Parties hereby stipulate and respectfully request that the Court approve modification of the existing Pretrial Scheduling Order as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Modification</u>
Initial disclosures required by Fed. R. Civ. P. 26(a)(1)	August 1, 2024	14 days after the settlement conference
Exchange of documents identified in each party's Fed. R. Civ. P. 26(a)(1) initial disclosures	August 1, 2024	14 days after the settlement conference
Motions to join or add parties	August 1, 2024	14 days after the settlement conference
Motions to amend the pleadings	August 1, 2024	14 days after the settlement conference

All other deadlines related to discovery will remain as set forth in the Pretrial Scheduling Order.

Consistent with the above, the Parties respectfully request that the Court enter the concurrently submitted proposed order.

Dated: July 18, 2024

/s/ Bailey Twyman-Metzger

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Respectfully submitted,

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